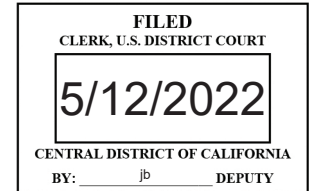


UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

MITCHELL VAUGHN LEE,

Defendant.

Case No. 2:22-mj-01906 -duty

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of May 12, 2022, in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 922(g)(1)

Offense Description

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/ Christopher Ramsay

Complainant's signature

Christopher Ramsay, FBI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 5/12/22

Judge's signature

City and state: Los Angeles, California

Hon. Charles Eick, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Christopher Ramsay, being duly sworn, declare and state as follows:

PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against MITCHELL VAUGHN LEE ("LEE") for a violation of 18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm.

2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only, and all dates are approximate.

BACKGROUND OF AFFIANT

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since December 2020.

2. I am currently assigned to the El Paso Division, Midland Resident Agency. I am responsible for investigating violations of federal law, including those laws found in Title 18 of the United States Code. By virtue of my FBI employment, I have performed a variety of investigative tasks, including

functioning as a case agent on criminal investigations. I have received training in the investigation of various criminal matters. In the course of conducting or participating in criminal investigations, I have been involved in conducting physical surveillance, analyzing bank records and other financial documents, analyzing telephone records, collecting and analyzing evidence, and preparing and executing search and arrest warrants.

SUMMARY OF PROBABLE CAUSE

3. In connection with an investigation into LEE for stealing mineral royalties from elderly victims, I obtained federal search warrants for LEE's apartment unit on South Spring Street, Los Angeles, California 90013 ("Spring Street Apartment") and person.

4. On May 12, 2022, agents executed the search warrants at the Spring Street Apartment, where LEE was the sole resident. Under LEE's mattress, agents found a loaded Glock 23 .40 caliber pistol. In a safe inside the apartment, agents found an additional two rounds of .40 caliber ammunition and one round of 9mm ammunition.

5. LEE has six prior felony convictions, including for assault with a deadly weapon and numerous controlled substance offenses, and is therefore prohibited from possessing a firearm or ammunition.

STATEMENT OF PROBABLE CAUSE

6. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

A. Agents Obtain Search Warrants in Connection with LEE's Scheme to Steal Mineral Rights Royalties

7. On May 2, 2022, the Honorable Alexander F. MacKinnon issued search warrants for the Spring Street Apartment and LEE's person to search for and seize evidence of violations of 18 U.S.C. § 1028 (Fraud and Related Activity in Connection with Identification Documents and Information) and 18 U.S.C. § 1343 (Wire Fraud). Case Nos. 22-MJ-1701 & 22-MJ-1702.

8. As detailed in the affidavit submitted in support of those warrants, the FBI is conducting an ongoing investigation into a scheme by LEE to steal oil and gas royalty funds from at least December 2021 through the present. Bank records and victim interviews show that LEE appears to be operating a number of bank accounts under stolen identities from victims around the United States. The victims are generally elderly in nature and own substantial acreage and mineral rights in the State of Texas. So far, the FBI has determined that LEE has defrauded royalty owners and oil and gas companies of over \$4.3 million in royalty payments.

B. Agents Search the Spring Street Apartment and Find a Loaded Gun and Additional Ammunition

9. On May 12, 2022, FBI agents executed the search warrants at the Spring Street Apartment. The Spring Street Apartment is a studio apartment with a single bed and couch.

10. Law enforcement databases show that LEE has a California driver's license with his residence listed as the Spring Street Apartment. According to records provided by The Residences at Hotel Alexandria, LEE entered into a lease agreement on February 21, 2018, for the Spring Street Apartment and is listed as its sole tenant as of April 25, 2022.

11. LEE was the only person present when agents arrived to execute the search warrants. An agent saw an empty handgun holster inside the apartment and asked LEE where the firearm was located. LEE responded that the firearm was located under the bed.

12. Agents searched under the mattress and found a Glock 23 .40 caliber pistol, bearing serial number BKWM339. The pistol contained a loaded magazine.

13. In a safe inside the apartment, agents found two loose rounds of .40 caliber ammunition and one round of 9mm caliber ammunition.

14. Agents also found in the apartment a wallet containing a driver's license in LEE's name that listed the Spring Street Apartment as his place of residence, as well as bills in his name.

15. Agents also found numerous identification documents and documents containing PII belonging to individuals other than LEE.

C. LEE's Criminal History

16. On May 12, 2022, I reviewed LEE's criminal history report from law enforcement databases and learned that LEE has

previously been convicted of the following felony crimes punishable by a term of imprisonment exceeding one year:

a. Transportation for Sale of a Controlled Substance, in violation of California Health and Safety Code Section 11352(a), in the Superior Court for the State of California, County of Los Angeles, Case Number XCNBA31508301, on or about February 2, 2007;

b. Possession of a Controlled Substance, in violation of California Health and Safety Code Section 11350(a), in the Superior Court for the State of California, County of Los Angeles, Case Number LACBA34400501, on or about August 18, 2008;

c. Possession of a Controlled Substance, in violation of California Health and Safety Code Section 11350(a), in the Superior Court for the State of California, County of Los Angeles, Case Number LACBA34861201, on or about December 4, 2008;

d. Transportation for Sale of a Controlled Substance, in violation of California Health and Safety Code Section 11352(a), in the Superior Court for the State of California, County of Los Angeles, Case Number XCNBA36568901, on or about February 19, 2010;

e. Possession of a Controlled Substance, in violation of California Health and Safety Code Section 11377(a), in the Superior Court for the State of California, County of Los Angeles, Case Number LACBA40864302, on or about March 11, 2013;
and

f. Assault with a Deadly Weapon, in violation of California Penal Code Section 245(a)(4), in the Superior Court for the State of California, County of Los Angeles, Case Number LAXSA09080201, on or about June 23, 2016.

D. Interstate Nexus

17. On May 12, 2022, an ATF interstate nexus expert examined the Glock 23 pistol and concluded that it was manufactured outside the State of California. Because the pistol was found in California, I believe that it has traveled in and affected interstate commerce.

CONCLUSION

18. For all of the reasons described above, there is probable cause to believe that LEE has committed a violation of 18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 12th day of
May, 2022



HONORABLE CHARLES EICK
UNITED STATES MAGISTRATE JUDGE